
UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT OF VIRGINIA,
CHARLOTTESVILLE DIVISION

Christopher Cantwell)
Plaintiff, Counterdefendant)
)
)
v.) Case No. 3:17-CV-00089
)
Emily Gorcenski,)
Kristopher Goad,)
Defendants, Counterclaimants)

MOTION FOR ATTORNEY ADMISSION *PRO HAC VICE*

COME NOW Ms. Emily Gorcenski and Mr. Kristopher Goad, Defendants and Counterclaimants, by and with their counsel Sandra Freeman and Pamela Starsia, to move this Court for admission *pro hac vice* of Moira Meltzer-Cohen to the Western District of Virginia for the purpose of Ms. Meltzer-Cohen acting as co-counsel in the above-captioned matter. In support of this request the Defendants/Counterclaimants and their counsel state the following:

1. Defendant/Counterclaimant Emily Gorcenski desires to retain the services of Ms. Moira Meltzer-Cohen as co-counsel in the above-captioned matter.
2. Defendant/Counterclaimant Kristopher Goad desires to retain the services of Ms. Moira Meltzer-Cohen as co-counsel in the above-captioned matter.
3. Counsel Sandra Freeman is admitted to practice in the Commonwealth of Virginia and in the Western District of Virginia.

4. Counsel Pamela Starsia is admitted to practice in the Commonwealth of Virginia and in the Western District of Virginia.
5. Ms. Meltzer-Cohen is an attorney admitted to practice before all courts in the state of New York, the District Court for the Southern District of New York, the District Court for the Western District of New York, the District Court for the Northern District of New York, the District Court for the Eastern District of New York, and the District Court for the District of North Dakota.
6. Ms. Meltzer-Cohen is currently in good standing in all jurisdictions in which she is licensed to practice.
7. Ms. Meltzer-Cohen received her law degree from the City University of New York (CUNY) School of Law, her Master of Science from the University of Wisconsin, Madison, and her Bachelor of Arts from the University of Michigan.
8. Ms. Meltzer-Cohen acts as the Principle Attorney for her own law office, located at 277 Broadway, Suite 1501, New York, New York 10007.
9. Ms. Meltzer-Cohen has previously collaborated with and acted as co-counsel to Sandra Freeman, counsel for the Defendants/Counterclaimants in the above-captioned matter.
10. Ms. Meltzer-Cohen may appear in association with Sandra Freeman for the conduct of this case;
11. Ms. Meltzer-Cohen may appear in association with Pamela Starsia for the conduct of this case;

For the foregoing reasons and any other that may appear to this Court, and pursuant to Western District of Virginia General Rule 6(d), Ms. Gorcenski and Mr. Goad, Defendants/Counterclaimants, and their current counsel Pamela Starsia and Sandra Freeman request that the Court admit Moira Meltzer-Cohen to appear *pro hac vice* on behalf of Ms. Gorcenski and Mr. Goad in the above-captioned matter.

Respectfully Submitted,
EMILY GORCENSKI
KRISTOPHER GOAD
By Counsel

Dated: February 27, 2018

/s/ Sandra Freeman
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CERTIFICATE OF SERVICE

I, Sandra C. Freeman, hereby certify that I served a true and correct copy of the foregoing document and proposed order upon the person(s) herein next designated, on the date shown below, by electronically delivering the same at his/her/their last known address(es), to wit:

ELMER WOODARD, Attorney for Christopher Cantwell
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Dated February 27, 2018.

/s/ Sandra C. Freeman
Sandra C. Freeman